

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

CASE NUMBER: 1:18-CV-68

STATE OF TEXAS, et al.,

Plaintiffs,

vs.

UNITED STATES OF AMERICA, et al.,

Defendants,

and

KARLA PEREZ, et al.,

Defendant-Intervenors,

and

STATE OF NEW JERSEY,

Defendant-Intervenor.

IT IS STIPULATED AND AGREED by and
between the parties that the deposition of
Gretel Felton may be taken before Angela Smith
McGalliard, RPR, CRR, CCR, at the offices of
the Alabama Attorney General, at 501 Washington
Ave., Montgomery, Alabama 36104, on the 12th
day of September, 2019.

DEPOSITION OF GRETTEL FELTON

1 IT IS FURTHER STIPULATED AND AGREED
2 that the signature to and the reading of the
3 deposition by the witness is not waived, the
4 deposition to have the same force and effect as
5 if full compliance had been had with all laws
6 and rules of Court relating to the taking of
7 depositions.

8 IT IS FURTHER STIPULATED AND AGREED
9 that it shall not be necessary for any
10 objections to be made by counsel to any
11 questions except as to form or leading
12 questions, and that counsel for the parties may
13 make objections and assign grounds at the time
14 of the trial, or at the time said deposition is
15 offered in evidence, or prior thereto.

16 IT IS FURTHER STIPULATED AND AGREED
17 that the notice of filing of the deposition by
18 the Commissioner is waived.

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I N D E X

EXAMINATION

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By Ms. Perales..... 7 18

By Mr. Disher..... 165 14

DEFENDANT'S EXHIBITS

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Defendant's Exhibit 1 - Notice of
Deposition..... 16 16

Defendant's Exhibit 2 - Felton resume 17 22

Defendant's Exhibit 3 - Declaration
signed by G. Felton,
August 7, 2019, with
previous declaration
attached..... 35 1

Defendant's Exhibit 4 - Portion of
Modified Adjusted Gross
Income manual - Bates 354
to 425..... 47 19

Defendant's Exhibit 5 -
Spreadsheets for
individuals with DACA

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KARLA PEREZ, et al.,

Defendant-Intervenors,

and

STATE OF NEW JERSEY,

Defendant-Intervenor.

BEFORE:

Angela Smith McGalliard,

Commissioner.

APPEARANCES:

TODD L. DISHER, ESQUIRE, of OFFICE OF
THE ATTORNEY GENERAL OF TEXAS, P.O. Box 12548,
Austin, Texas 78711, appearing on behalf of the
Plaintiffs.

1 JAMES WALKER, ESQUIRE, of U.S.
2 DEPARTMENT OF JUSTICE, P.O. Box 868,
3 Washington, D.C. 20044, appearing on behalf of
4 the Defendants.

5 WINFIELD J. SINCLAIR, ESQUIRE, of
6 OFFICE OF THE ATTORNEY GENERAL OF ALABAMA, 501
7 Washington Ave., Montgomery, Alabama 36104,
8 appearing on behalf of the Deponent.

9 JEREMY HOLLANDER, ESQUIRE, of OFFICE
10 OF THE ATTORNEY GENERAL OF NEW JERSEY, 25
11 Market Street, 8th Floor, Trenton, New Jersey
12 08625, appearing by telephone on behalf of the
13 Defendant-Intervenor.

14 NINA PERALES, ESQUIRE, of MALDEF, 110
15 Broadway, Suite 300, San Antonio, Texas 78205,
16 appearing on behalf of the
17 Defendant-Intervenors.

18 RAMON A. SOTO, ESQUIRE, of MALDEF,
19 110 Broadway, Suite 300, San Antonio, Texas
20 78205, appearing on behalf of the
21 Defendant-Intervenors.

22 ALSO PRESENT: Bo Offord, Esq.

23 * * * * *

1 I, Angela Smith McGalliard,
2 Registered Professional Reporter, Certified
3 Realtime Reporter and Certified Shorthand
4 Reporter, of Pike Road, Alabama, acting as
5 Commissioner, certify that on this date, as
6 provided by the Federal Rules of Civil
7 Procedure and the foregoing stipulation of
8 counsel, there came before me at the offices of
9 the Alabama Attorney General, 501 Washington
10 Ave., Montgomery, Alabama 36104, beginning at
11 9:22 a.m., Gretel Felton, witness in the above
12 cause, for oral examination, whereupon the
13 following proceedings were had:

14 GRETEL FELTON,
15 being first duly sworn, was examined and
16 testified as follows:

17 EXAMINATION

18 BY MS. PERALES:

19 Q. Good morning.

20 A. Good morning.

21 Q. My name is Nina Perales, and I am
22 one of the attorneys in this litigation. I
23 represent the group of people in the case known

1 Q. Of course.

2 A. Of course, that's just the MAGI
3 that we're talking about that are in the new
4 system.

5 Q. Okay. Were there any documents
6 that were requested in the subpoena duces tecum
7 that exist but that you weren't able to bring
8 today?

9 MR. SINCLAIR: Object to the
10 form.

11 MR. DISHER: And I'll just add to
12 that one, just so there's clarity, I do -- I
13 understand, perhaps, that there are some
14 additional documents that are going through the
15 security review process. Those are not the
16 documents that were in Ms. Felton's possession,
17 custody, or control, and those are not
18 documents that she relied on to form the
19 opinions expressed in her declaration. But
20 there may very well be additional documents
21 that are still going through the security
22 review process.

23 MS. PERALES: Okay. Thank you.

REPORTER'S CERTIFICATE

STATE OF ALABAMA,
MONTGOMERY COUNTY,

I, Angela Smith McGalliard, Registered
Professional Reporter, Certified Realtime
Reporter, Certified Court Reporter and
Commissioner for the State of Alabama at Large,
do hereby certify that the above and foregoing
proceeding was taken down by me by stenographic
means, and that the transcript was produced by
computer aid under my supervision, and that the
foregoing represents a true and correct
transcript of the proceedings occurring on said
date and at said time.

I further certify that I am neither of
kin nor of counsel to the parties to the
action; nor in any manner interested in the
result of said case.

Signed the 26th day of September, 2019.



Angela Smith McGalliard

ANGELA SMITH MCGALLIARD, RPR, CRR, CCR

AL CCR Lic. No. 98, Expires 9/30/20

Notary Expiration 8/13/2023